1 2 3	95	LECTION COMMISSION 99 E Street, N.W. nington, D.C. 20463
5	FIRST GENERAL COUNSEL'S REPORT	
6	FIRST GENE	RAL COUNSELS REPORT
7		MUR: 5908
8		DATE SUBMITTED: March 14, 2007
9		DATES OF NOTIFICATION: March 19, 2007,
10		June 20, 2007, July 26, 2007 ¹
11		RESPONSES RECEIVED: April 30, 2007, August
12		6, 2007
13		DATE ACTIVATED: June 18, 2007
14		
15		EXPIRATION OF SOL: October 1, 2011
16	COMMIT A TATA NET.	
17 18	COMPLAINANT:	Citizens for Responsibility and Ethics in Washington
19		w asinington
20	RESPONDENTS:	Duncan Hunter;
21		Hunter for President, Inc. and Bruce Young, in his
22		official capacity as Treasurer; and
23		Peace Through Strength Political Action Committee
24		and Meredith G. Kelley, in her official capacity as
25		Treasurer
26		
27	RELEVANT STATUTES:	2 U.S.C. § 431
28		2 U.S.C. § 432
29 30		2 U.S.C. § 433 2 U.S.C. § 434
31		2 U.S.C. § 441a
32		11 C.F.R. § 100.72
33		11 C.F.R. § 100.131
34		11 C.F.R. § 110.2
35		11 C.F.R. § 104.3
36		11 C.F.R. § 104.9
37		•
3 8 39	INTERNAL REPORTS CHECKED:	Disclosure Reports
40 41	FEDERAL AGENCIES CHECKED:	None

¹ Although the initial notification was sent only to Peace Through Strength Political Action Committee, further review of the complaint revealed the need to notify Duncan Hunter, and later, Hunter for President.

I. INTRODUCTION

This complaint involves allegations that Duncan Hunter and his Leadership PAC, Peace 2 Through Strength Political Action Committee ("PTS PAC"), violated various provisions of the 3 Federal Election Campaign Act of 1971, as amended, ("the Act") in connection with PTS PAC's 4 5 activities in support of Hunter's 2008 Presidential campaign. Specifically, Complainant alleges that: (1) PTS PAC expended more than \$5,000 to publicize Hunter's intention to run for 7 President and, therefore, should have registered as Hunter's principal campaign committee; (2) Duncan Hunter, through PTS PAC, accepted contributions to support his candidacy that were in 8 excess of the legal limit while "testing the waters" to determine whether he would run for 9 10 President: (3) once Hunter officially became a candidate and registered a principal campaign committee. PTS PAC made excessive in-kind contributions to Hunter for President, Inc. 11 ("Hunter for President") by paying for advertisements to promote Hunter's Presidential 12 campaign; and (4) PTS PAC failed to report disbursements for television advertisements 13 featuring Duncan Hunter that aired in the early primary states of Iowa and New Hampshire in 14 December of 2006. 15 PTS PAC generally denied the allegations made in the complaint and contends that the 16 advertisements it aired did not contain express advocacy or an electioneering message, and were 17 properly reported as disbursements by the PAC. PTS PAC did not address the allegation that it 18 funded Hunter's travel for "testing the waters" activities. See Complaint ¶ 8, 25-27. Duncan 19 Hunter did not submit a response to the complaint. Hunter for President did not respond other 20 than to state that PTS PAC had previously responded. 21

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1	Altho	ugh we conclude that the television ads that are the primary focus of the complaint
2	did not const	itute an in-kind contribution to Hunter's presidential campaign or cause Hunter to
3	trigger candi	date status, it appears that other PTS PAC disbursements did lead to violations of
4	the Act. Bas	ed on the complaint, the response, and publicly available information, we
5	recommend t	he Commission find:
6	(1)	Reason to believe that Duncan Hunter violated 2 U.S.C. § 432(e)(1) by
7	ν-/	failing to timely file a Statement of Candidacy and also violated 11 C.F.R.
8		§§ 100.72 and 100.131 by failing to maintain records of contributions
9		received and expenditures made while he was "testing the waters" to
0		determine whether he would become a candidate for President;
1	(2)	Reason to believe that Hunter for President, Inc. and Bruce Young, in his
2	-	official capacity as Treasurer, violated 2 U.S.C. § 434(a)(3) by failing to
3		report contributions received and expenditures made by Hunter during the
4		"testing the waters" period after it registered as Hunter's principal
5		campaign committee and was required to file reports of receipts and
6		disbursements with the Commission;
17	(3)	Reason to believe that Peace Through Strength Political Action Committee
18		and Meredith G. Kelley, in her official capacity as Treasurer, violated
19		2 U.S.C. § 441a and 11 C.F.R. § 110.2(b)(1) by making excessive in-kind
20		contributions to Duncan Hunter for his Presidential campaign and that
21		Duncan Hunter and Hunter for President, Inc. and Bruce Young, in his
22		official capacity as treasurer, violated 2 U.S.C. § 441a(f) by accepting
23		excessive contributions; and
24	(4)	Take no action at this time regarding the allegation that Peace Through
)6		Strangth Political Action Committee and Mandith C. Kalley in her

official capacity as Treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R.

advertisements run in Iowa and New Hampshire in December of 2006.

§§ 104.3(b) and 104.9(a) by failing to report disbursements for television

II. FACTS

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- 2 Duncan Hunter is a member of Congress from California's 52nd Congressional District.²
- 3 He is also currently a candidate for President. Hunter's campaign website indicates that his
- 4 candidacy is focused on the issues of "border enforcement," the "war on terror," and "fair trade."
- 5 See www.gohunter08.com.
- 6 Hunter registered his Presidential exploratory committee with the Commission on
- 7 January 8, 2007, filed his Statement of Candidacy on January 23, 2007, and registered his
- 8 principal campaign committee for his Presidential campaign, Hunter for President, with the
- 9 Commission on January 25, 2007. Various news reports, however, indicate that Hunter was
- 10 publicly speaking about his bid for the Presidency as early as October 2006. Other news reports
- also indicate that Hunter was traveling to early primary states in support of his bid for the
- 12 Presidency as early as October 2006 through January 23, 2007, the date he filed his Statement of
- 13 Candidacy with the Commission. Although it appears that Hunter was "testing the waters" for a
- 14 Presidential bid, or perhaps, had already become a candidate under the Act from October 2006
- 15 through January 2007 (when he registered his principal campaign committee), Hunter for
- 16 President did not report any contributions received or expenditures made by Hunter.

² Mr. Hunter has, however, announced his intention to retire at the end of the current term and is not running for reelection to his Congressional seat.

³ He reportedly traveled to states such as South Carolina, New Hampshire, and Iowa. See John Van Doorn, <u>Duncan Hunter's hard road ahead</u>, North County Times, Dec. 6, 2006, at www.nctimes.com; Jason Spencer, <u>2008</u>

<u>Presidential Candidate Comes to Town</u>, GoUpstate.com, Dec. 11, 2006, at www.goupstate.com; Associated Press, In <u>Iowa, Hunter Touts Strong Defense</u>, The Des Moines Register, Dec. 16, 2006, at www.desmoinesregister.com; James Pindell, <u>Hunter to visit N.H. for first time since announcing presidential ambitions</u>, The Boston Globe, Jan. 5, 2007, at www.boston.com.

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PTS PAC is a nonconnected, multi-candidate political committee that registered with the

- 2 Commission in 2002. Duncan Hunter is the honorary chairman of PTS PAC, which appears to
- 3 function as his Leadership PAC. PTS PAC also focuses on defense, border security, and trade
- 4 issues. See PTS PAC Response. During approximately the last quarter of 2006, PTS PAC raised
- 5 \$150,422 and spent \$101,148. PTS PAC made \$90,570.26 in disbursements in South Carolina,
- 6 New Hampshire, and Iowa the states Hunter reportedly traveled to in support of his Presidential
- 5 bid from October 2006 through January 25, 2007.
 - At the end of 2006 and into early 2007, PTS PAC ran the three different television ads specifically mentioned in the complaint. In each of the three ads, Duncan Hunter introduces himself, without reference to his status as a candidate, and then proceeds to discuss either immigration or trade with China. See Attachment 1 (Scripts for Commercials). PTS PAC reported disbursements for media buys in South Dakota and South Carolina, which appear to have been made to purchase air time to run these ads. According to the complaint, PTS PAC also reportedly ran ads in Iowa and New Hampshire, although they did not report any disbursements for media buys in those states for December 2006. However, PTS PAC did report

⁴ The advertisements may be viewed at www.peacethroughstrengthpac.com.

⁵ The disbursements were reported as being made to various television stations in both states and described as "PAC media advertisements" or "PAC media services." Various news reports seem to indicate that those were the only ads being run by the PAC at the time.

disbursements to television stations in Iowa and New Hampshire in its Mid-Year 2007 report.⁶

III. <u>ANALYSIS</u>

A. Duncan Hunter's Candidacy

1. <u>"Testing the Waters"</u>

Under the Act, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations under the Act) when his or her campaign either receives \$5,000 in contributions or makes \$5,000 in expenditures. 2 U.S.C. § 431(2). There is, however, a limited exception for amounts raised and spent while an individual is "testing the waters" in order to decide whether to become a candidate. In such cases, the Commission's regulations provide that the terms "contribution" and "expenditure" do not include funds received or payments made solely to determine whether an individual should become a candidate. 11 C.F.R. §§ 100.72(a) and 100.131(a). Thus, before making a final decision as to whether to become a candidate, an individual may raise or spend more than \$5,000 without triggering candidate status if his or her activities are permissible "testing the waters" activities, which include, but are not limited to, conducting polls, making telephone calls, and travel. *Id.* Only funds permissible under the Act may be used for such activities. *Id.*

However, when an individual raises or spends more than \$5,000 and engages in activities indicating that he or she has decided to run for a particular office, or activities relevant to conducting a campaign, the individual is deemed to have crossed the line from "testing the waters" to "candidate" status under the Act. These activities include, but are not limited to:

⁶ PTS PAC reported two disbursements made on January 19, 2007, one to a television station in Iowa and one to a television station in New Hampshire, for "PAC media advertisements."

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- using general public political advertising to publicize the individual's intention to campaign for
- 2 federal office; raising funds in excess of what could reasonably be expected to be used for
- 3 exploratory activities or activities designed to amass funds to be spent after becoming a
- 4 candidate; making or authorizing written or oral statements that refer to the individual as a
- 5 candidate for a particular office; or conducting activities in close proximity to the election or over
- 6 a protracted period of time. 11 C.F.R. §§ 100.72(b) and 100.131(b).
- 7 At an October 30, 2006 news conference, Hunter told the audience "As I finish my final
- 8 two years as chairman of the Armed Services Committee and serve you, I am also going to be
- 9 preparing to run for president of the United States in 2008." William Finn Bennett, Hunter
- announces possible run for president, North County Times, Oct. 30, 2006, at www.nctimes.com.
- 11 When asked "why are you running" in an interview with a Newsweek reporter that same week,
- 12 Hunter answered directly, without denying that he was running, "because I believe national
- 13 security and a strong military are more important issues now than they have ever been." Jamie
- 14 Reno, O&A: Duncan Hunter on '08 White House Bid, Newsweek, Oct. 31, 2006, at
- 15 www.msnbc.msn.com. In that same interview, Hunter stated that "while I've announced that I
- am preparing to run for president, I have not made a formal announcement of my candidacy.
- 17 This gives me a chance to make another speech." Id.
- 18 It appears that Hunter was also traveling to early primary states to publicize his
- 19 Presidential campaign, and/or gauge support for his campaign, during the October 2006 through
- 20 January 2007 period. In one trip to South Carolina, Hunter attended a reception "orchestrated by
- 21 [the] Spartanburg County Republican Party Chairman" where he apparently discussed what his
- 22 goals would be as president. Jason Spencer, 2008 Presidential Candidate Comes to Town.

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1 GoUpstate.com, Dec. 11, 2006, at www.goupstate.com. According to the news article, Hunter

2 paid for the reception, and told attendees "I'm just asking me [sic] to keep you [sic] on your

radar, because I'm going to be running." Id. (emphasis added). Hunter also told attendees: "I

4 have the conservative ideas which are worth more than money, with respect to national defense,

5 my border fence and the two-way street on trade. That's a message that will resonate with South

6 Carolina, and gives me an excellent chance to win." Id. (emphasis added). Another article

7 talked about Hunter's first visit to Iowa in December 2006, reporting that he attended a pancake

breakfast and a pheasant hunt and discussed his presidential campaign. Associated Press, In

9 <u>Iowa, Hunter Touts Strong Defense</u>, The Des Moines Register, Dec. 16, 2006, at

10 www.desmoinesregister.com. Hunter also traveled to New Hampshire prior to filing his

11 Statement of Candidacy. One article about his New Hampshire trip stated that during that trip

Hunter "called himself the most conservative Republican in the Presidential sweepstakes. That,

he said, 'gives me a chance,' despite his low name recognition." John DiStaso, California rep

14 touts conservative appeal. The Manchester Union Leader, Jan. 9, 2007, at www.unionleader.com.

Based on Hunter's October 30, 2006 statement and the interview that followed, it appears that Hunter had already decided to become a candidate as of that date. This conclusion is also supported by the statements Hunter made in trips to early primary states in December 2006. He advertised his intention to the public in a press conference and made statements acknowledging himself to be a candidate in media interviews. Having apparently already made the decision to run for President and advertising that decision to the general public, the only remaining question

⁷ In MUR 5363 (Sharpton), the Commission determined that Rev. Sharpton had become a candidate when he crossed the contribution and expenditure threshold and published a book in which he unequivocally referred to himself as a candidate for President, even though he made statements after the publication of the book that he was "not officially declared as a candidate" and had "not decided finally" whether to run.

- is when did he raise or spend \$5,000 in support of his campaign. Once he received \$5,000 in
- 2 contributions or made \$5,000 in expenditures for his Presidential campaign, he became a
- 3 "candidate" under the Act and was required to register and report as such with the Commission.

2. Candidate Status

Achieving "candidate" status triggers registration and reporting requirements for the candidate and for his or her principal campaign committee. Within 15 days of becoming a candidate, the individual must file a Statement of Candidacy with the Commission that designates the candidate's principal campaign committee. 2 U.S.C. § 432(e)(1); see also 11 C.F.R. § 101.1(a). The principal campaign committee must file a Statement of Organization no later than ten days after it has been designated by the candidate, 2 U.S.C. § 433(a), and must also, in the case of a principal campaign committee for a Presidential candidate, file timely financial disclosure reports as required by 2 U.S.C. § 434(a)(3). All reportable amounts from the beginning of the "testing the waters" period must be reported on the first financial disclosure report filed by such committee, even if the amounts were received or expended prior to the current reporting period. See 11 C.F.R. §§ 104.3(a) and (b).

If an individual who has been "testing the waters" subsequently becomes a candidate, funds received or payments made for "testing the waters" are contributions and expenditures subject to the reporting requirements of the Act. 11 C.F.R. §§ 100.72(a) and 100.131(a). Such contributions and expenditures must be reported with the first report filed by the principal campaign committee of the candidate, regardless of the date the funds were received or the payments made. *Id.* Accordingly, once Hunter became a candidate, his principal campaign

committee was responsible for reporting all of the campaign-related expenses that he incurred during the "testing the waters" period.

Although Hunter undoubtedly incurred expenses in connection with his travel from October through December 2006, Hunter for President reported no contributions or expenditures for that time period. It is unknown whether he was raising any money for his Presidential campaign during that time period. Hunter for President only reported two contributions and one expenditure prior to January 25, 2007 (all three occurring in January of 2007). It seems highly unlikely, however, that he would have incurred no other expenses and raised no other money between his October 30, 2006 announcement and filing his Statement of Candidacy in January 2007.

Therefore, we recommend that the Commission find reason to believe that Duncan Hunter violated 2 U.S.C. § 432(e)(1) and 11 C.F.R. §§ 100.72 and 100.131 by failing to report contributions received and expenditures made by Duncan Hunter while he was "testing the waters" for a Presidential bid.

B. Hunter for President: Duty to Report Contributions and Expenditures

While it is the candidate's responsibility to keep a record of contributions received and expenditures made while "testing the waters," those contributions and expenditures must be reported once he or she officially becomes a candidate and registers a principal campaign committee with the Commission. 11 C.F.R. §§ 100.72 and 100.131. The duty to file reports of receipts and disbursements then falls on the principal campaign committee. 2 U.S.C. § 434(a)(3); see also 11 C.F.R. §§ 104.3(a) and (b). As noted above, Hunter for President did not report any contributions or expenditures for the period from October 2006 through December

- 2006 when it appears that Hunter was either "testing the waters" or already a candidate.
- 2 Therefore, we also recommend that the Commission find reason to believe that Hunter for
- 3 President, Inc. and Bruce Young, in his official capacity as Treasurer, violated 2 U.S.C.
- 4 § 434(a)(3).

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C. PTS PAC: Excessive In-Kind Contributions and Duty to Report Expenditures

1. Hunter's Travel

While the available information shows that Hunter for President failed to report disbursements related to Hunter's travel to publicize his Presidential campaign from October 2006 through the beginning of January 2007, PTS PAC did report disbursements which may be related to Hunter's travel during this period. Specifically, PTS PAC reported \$20,185.26 in expenditures for food and beverage and "media services" in South Carolina in December 2006. According to news reports, Hunter was in South Carolina probably at least twice during the month of December. See John Van Doom, Duncan Hunter's hard road ahead, North County Times, Dec. 5, 2006, at www.nctimes.com; Jason Spencer, 2008 Presidential Candidate Comes to Town, GoUpstate.com, Dec. 11, 2006, at www.goupstate.com. Therefore, it appears that PTS PAC may have paid some of Hunter's expenses for "testing the waters" and/or when he had already become a candidate but had not filed a Statement of Candidacy.

Therefore, we recommend that the Commission find reason to believe that Peace Through
Strength Political Action Committee and Meredith G. Kelley, in her official capacity as
Treasurer, violated 2 U.S.C. § 441a and 11 C.F.R. § 110.2(b)(1) by making excessive in-kind
contributions to Duncan Hunter for his Presidential campaign and that Duncan Hunter and

- Hunter for President, Inc. and Bruce Young, in his official capacity as treasurer, violated
- 2 2 U.S.C. § 441a(f) by accepting excessive contributions.

2. Television Advertisements

Complainant alleges that PTS PAC ran three television advertisements "designed to publicize Rep. Hunter's intention to campaign for federal office by introducing him to early primary voters" in South Dakota, South Carolina, Iowa, New Hampshire, and North Carolina in late 2003 and early 2004. Complaint at ¶ 30. The response to the complaint provided scripts of the advertisements described in the complaint. Attachment 1. A review of these ads reveals that although Hunter is identified (both by being the pictured speaker in the ad and stating either "I'm Duncan Hunter" or "I'm Congressman Duncan Hunter"), there is no mention of Hunter as a current candidate for federal office or of any election. Each ad focuses on an issue similar to the issues highlighted in Hunter's presidential campaign platform (border security or trade with China), but they are the issues on which PTS PAC appears to have focused since its inception. Therefore, they are the type of ads Hunter would be expected to do for PTS PAC even if he was not running for President. Although the ads were run in many of the states Hunter appears to have traveled to in order to publicize and promote his Presidential campaign.

If it is determined that Hunter was already a candidate at the time the ads were first aired, which appears to have been December 2006, then the ads might be subject to an analysis to determine whether they were coordinated communications with Hunter as a candidate. However, while the payment and conduct prongs of the coordination regulation might be met, a review of the ads and the timing of the airing of the ads show that the content prong cannot be met. (The ads do not contain express advocacy, and at the time they were apparently aired, did not fall within the time periods for electioneering communications or the 120 day period for a public communication referencing a Presidential candidate.) See 11 C.F.R. § 109.21(c).

apparently in somewhat close proximity to Hunter being in the state, we cannot conclude that the ı ads were for the purpose of influencing a federal election.9 2

The complaint also alleges that PTS PAC violated the Act by failing to report 3 expenditures made for television advertisements aired in Iowa and New Hampshire in December 5 of 2006. It appears that the content of these ads is the same as the three ads discussed above and in the complaint. According to news reports, PTS PAC began airing a television ad on border 6 7 control in Iowa, New Hampshire, and South Carolina on December 19, 2006. See Jessica Holzer, The 2008 ad blitz begins, The Hill, March 1, 2007, at www.thehill.com. Although PTS 8 PAC reported expenditures to television stations in South Carolina on its 2006 Year-End Report, 9 it did not report expenditures made to Iowa and New Hampshire television stations until January 10 19, 2007 in its 2007 Mid-Year Report. 10 Therefore, it appears that PTS PAC reported payments П for advertisements aired in Iowa and New Hampshire. 12 However, since the descriptions of the disbursements in the PAC's disclosure reports are 13 not detailed enough to conclusively prove that these disbursements were for the ads at issue in 14 the complaint, we recommend that the Commission take no action at this time with regard to the

⁹ In paragraph 20 of the factual section of the complaint, Complainant claims (based on a news article attached as Exhibit H to the complaint) that "at the time WMUR aired the border fence advertisement in February 2007, PTS PAC's website directed readers to 'please visit Duncan Hunter for President 2008,' and provided a direct hyperlink to Hunter for President's website, www.gohunter08.com. ... PTS PAC has since removed the message and hyperlink from its website." Aside from Complainant's allegation relying solely on the one news article, we have no information regarding the presence of the hyperlink on PTS PAC's website. If, during the course of the investigation, we discover any evidence indicating that the hyperlink was on PTS PAC's website for a substantial amount of time or was coordinated with the candidate, we will then make the appropriate recommendation to the Commission.

¹⁰ PTS PAC reported a January 19, 2007 disbursement in the amount of \$5,130 to KCCI-TV in Iowa for "PAC media advertisement." PTS PAC also reported a January 19, 2007 disbursement in the amount of \$5,000 to WMUR-TV in New Hampshire for "PAC media advertisement."

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1	allegation that Peace Through Strength Political Action Committee and Meredith G. Kelley, in
2	her official capacity as Treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. §§ 104.3(b) and
3	104.9(a) by failing to report disbursements for television advertisements in Iowa and New
4	Hampshire in December of 2006. If we uncover any additional information which suggests that
5	the disbursements reported on the 2006 Year-End or 2007 Mid-Year reports are not connected to
6	the ads at issue here, we will make appropriate recommendations to the Commission.
7	IV. PROPOSED COURSE OF ACTION
8	We believe a limited investigation will be required in this case in order to establish: (1)
9	when Mr. Hunter made his decision to run for President, (2) when he raised or spent \$5,000
10	towards that effort
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16	Although these questions should easily
17	be answered through informal discovery, we should be prepared to issue interrogatories and
18	subpoenas if the information is not forthcoming. Accordingly, this Office requests that the
19	Commission authorize the use of compulsory process in this matter.

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V. **RECOMMENDATIONS**

- 1. Find reason to believe that Duncan Hunter violated 2 U.S.C. § 432(e)(1) and 11 C.F.R. §§ 100.72 and 100.131, and 2 U.S.C. § 441a(f);
- 2. Find reason to believe that Hunter for President, Inc. and Bruce Young, in his official capacity as Treasurer, violated 2 U.S.C. §§ 434(a)(3) and 441a(f);
- Find reason to believe that Peace Through Strength Political Action Committee and Meredith G. Kelley, in her official capacity as Treasurer, violated 2 U.S.C. § 441a and 11 C.F.R. § 110.2(b)(1);
- 4. Take no action at this time with regard to the allegation that Peace Through Strength Political Action Committee and Meredith G. Kelley, in her official capacity as Treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. §§ 104.3(b) and 104.9(a):
- 5. Approve the attached Factual and Legal Analyses;
- 6. Authorize the use of compulsory process in this matter; and
- 7. Approve the appropriate letters.

Thomasenia P. Duncan **General Counsel**

1-18-08

Date

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> 38 39 40

41 42 43 Mark D. Shonkwiler

Kathleen M. Guith

Enforcement

Acting Deputy Associate General Counsel

Acting Associate General Counsel for

for Enforcement

Wassom

Attorney

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2	Attachments:

1 - Scripts of Commercials

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SCRIPTS FOR PEACE THROUGH COMMERCIALS

Script for Peace Through Strength - Border Fence

I'm Duncan Hunter. We built this double fence here at the Mexican border in San Diego and reduced the smuggling of hundreds of thousands of people and tons of drugs by more than 90%. The fence works and the new law provides for it to be built 700 miles across Arizona, New Mexico and Texas. Join with me, Duncan Hunter, in Peace Through Strength. Let's make sure that Homeland Security builds the border fence. It works and it's the law.

Script for Peace Through Strength - Submarine

I'm Congressman Duncan Hunter. A few weeks ago when the Song Class Chinese submarine emerged next to one of our aircraft carriers, about 80 miles off Okinawa, it showed the American people what the Chinese were buying with American trade dollars. They're cheating on trade, and they're buying ships and planes and missiles with our money, as well as taking millions of jobs. Join me at Peace Through Strength for fair trade.

Script for Peace Through Strength - Football

I'm Congressman Duncan Hunter. Americans start a football game with a clean scoreboard but China starts a game against our businesses with a 74 point advantage. They give a 17 percent subsidy to their guys, they penalize our guys 17 percent and devalue their currency by 40 percent. That's cheating and China is buying ships and planes and missiles with American trade dollars. Join me at Peace Through Strength for fair trade.

ATTACHEST _____